

Palani Karupaiyan et al V Experis it et al	In The US Dist Court of Southern Dist for New York – SDNY Docket# 21-Cv-4675-LGS	
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To
Hon Judge Lorna G Schofield
US Dist Court for SDNY

2nd-AMENDED- Motion to Extent the discovery until
Mar 25 2023 and motion to appoint probono attorney
and other relief.

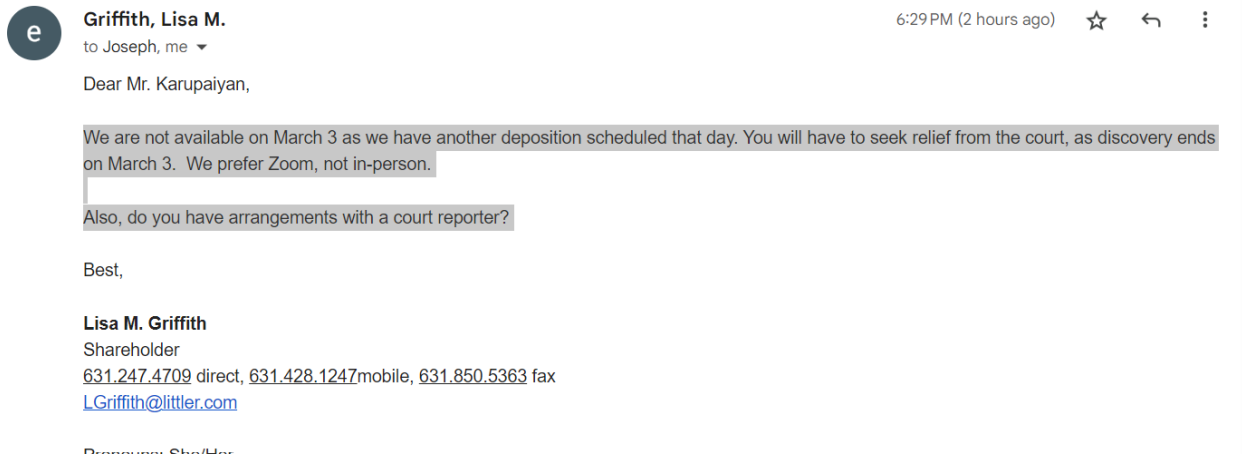
- 1) Defendants requested plaintiff Deposition on Feb 28 2023.
- 2) Plaintiff requested the defendant Samantha Moore appearance on Mar 1 2023, for which defendants did not responded me.
- 3) This court ordered the discovery be completed by Mar 3 2023.
- 4) On Feb 28 2023, Experis defendant take plaintiff testimony/deposition until 8:40pm? While taking deposition, I was not able to see the exhibits on my phone, so defendant should reschedule on Feb 3 2023. Then I used my laptop to see the exhibits.
- 5) On Feb 28 2023, when the deposition reached until 8:40 Im become ill because only one meal I took for whole day. Deposition is not 100% completed,

gender discrimination, retaliation. US discrimination, less well treated/desperate treatment, favoring foreigner against US Citizen and few more claims' deposition is not completed by defendant.

Due to very long deposition, I become ill.

- 6) During the discovery time, On Feb 21 2023, US Supreme court denied my petition related to parental rights based on forma pauperis. Now Im drafting the Petition for Rehearing with US Supreme court which is another 10 days effort. More importantly, this US Supreme Court parallel docket is waiting for this petition for rehearing.
- 7) By Mar 20 2023, I need to Response the Motion for Summary Judgment of Karupaiyan v. CVS Health in SDNY where CVS did not pay me.
- 8) From above, Experis did not complete the deposition 100%, they need to reschedule to complete their part.
- 9) For my request for Deposition for Ms Moore to appear defendant attorneys said that they were not available for Feb 2 2023 or Feb 3 2023. No response for Feb 1 2023.

10) When I tried to reach the defendants for Mar 3 2023 for deposition defendant attorney replied as below



11) Based on above 2 pleading I will not be take or deposition of Ms Moore before Mar 20 2023.

12) Previously, this court denied appearance of Experis CEO because Defendant Moore should be able to answer the matter instead of Experis CEO.

13) Now the situation that I will not able to take no individual deposition.

14) So plaintiff pray this court to extension the Discovery deadline until Mar 25 2023.

15) Plaintiff is not good in telephonic conversation so inperson is needed. Prose plaintiff does not work

at office as defendant attorneys. So plaintiff pray a place in the court house for taking deposition.

16) In the CVS case, I was told that I can use Court house some place for taking deposition and use phone to record the conversation. If possible plaintiff pray this court to arrange the Court reporter.

17) In the past when telephonic hearing, plaintiff requested for appoint pro bono attorney, Hon Judge said that during the discovery and trial attorney will be provide.

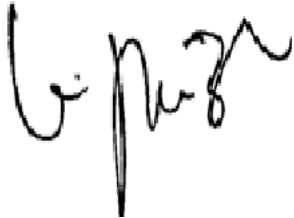
Without attorney, Im struggling and defendant attorneys were tricking the plaintiff.

18) So plaintiff pray this court to i) appoint pro bono attorney and ii) extension the discovery until Mar 25 2023,
iii)place arrangement in court house for taking deposition. When no place in court house, order the defendant attorney's office should accommodate the deposition.s
iv) an reporter to record the deposition.

For any and all reason stated plaintiff pray this court
for 3 weeks stay the case.

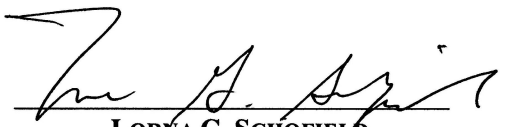
Respectfully submitted.

Date: Mar 1 2023.



Palani Karupaiyan
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Copy to defendant attorney and thru ECF
Thru email lgriffith@littler.com



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Application **GRANTED IN PART**. Plaintiff's requests for the appointment of counsel and a stay of this case are **DENIED**. Regarding the appointment of counsel, "in a civil case, the Court has no authority to appoint counsel, but instead may only request than an attorney volunteer to represent a litigant." *Azkour v. Little Rest Twelve, Inc.*, 645 F. App'x 98, 102 (2d Cir. 2016) (cleaned up) (summary order). The need for *pro bono* counsel in civil cases is far greater than the availability of volunteer lawyers. Plaintiff may request counsel again if this case proceeds to trial. Regarding the stay of this case, the orders issued December 6, 2022, and February 1, 2023, reminded the parties of their obligation to diligently take discovery, notwithstanding any competing obligations or other pending cases.

Plaintiff's request for an extension of discovery is **GRANTED**, for the limited purpose of conducting a deposition of Ms. Moore. Discovery is extended to March 31, 2023. Plaintiff's request for a court reporter to take the deposition of Ms. Moore is **DENIED**. The costs of a deposition must be paid by the party that requests them. The granting of *in forma pauperis* status does not provide for the costs of any discovery. Plaintiff is encouraged to take the deposition of Ms. Moore using written interrogatories, pursuant to Federal Rule of Civil Procedure 31. The parties shall meet and confer in good faith regarding the form and scheduling of Ms. Moore's deposition, provided any such deposition shall be completed by March 31, 2023. If Plaintiff is willing to retain and pay for a court reporter, he may renew his request for space at the courthouse in which to take the deposition. The deadlines set forth in the Amended Case Management Plan and Scheduling Order, issued February 1, 2023, are modified as follows:

- The parties shall complete fact discovery by **March 31, 2023**.
- The parties shall file a joint status letter, which shall include a statement as to a referral for further settlement discussions, by **April 7, 2023**.
- On **April 19, 2023, at 4:10 P.M.**, a case management conference will be held regarding any anticipated motions for summary judgment.

So Ordered. The Clerk of Court is respectfully directed to adjourn the case management conference scheduled for March 22, 2023, to April 19, 2023, at 4:10 P.M.

Dated: March 7, 2023
New York, New York